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EX PARTE

APR 26 2003

April 24, 2003

By Hand Delivery

COMMUNICATIONS COMMISSION

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20551

Re: Ex Parte Notice – MB Docket No. 02-277 and MM Docket  
Nos. 01-235, 01-317 and **00-244** (2002 Biennial Regulatory  
Review of the Commission's Broadcast Ownership Rules and  
Other Rules)

Dear Ms. Dortch:

On Thursday, April 24, 2003, Jonathan Blake, Robert Long and Heidi Doerhoff, representing the Network Affiliated Stations Alliance ("NASA") met with John Rogovin, General Counsel, and Louis Peraert, Marilyn Sonn and Linda Kinney of the Office of General Counsel to address one specific legal issue that has recently been raised in connection with the 35% cap aspect of this proceeding -- whether the Court would apply a laxer standard or accord the Commission greater deference if it were to modify or eliminate the 35% national ownership cap, as opposed to retaining it. The NASA representatives pointed out that the same record that must be evaluated to determine whether to retain the 35% cap as continuing to be in the public interest would have to be used to support a decision to change the level of the cap or eliminate it. Accordingly, there is no basis, in our judgment, for presupposing that a decision to increase the 35% cap (or eliminate it) would receive different, more accommodating judicial review. And in view of the evidence in the record, NASA believes that such a decision would be more vulnerable to judicial challenge.

Pursuant to Section 1.1206(b) of the Commission's Rules, an original and 8 copies of this letter (two copies for each docket number) are being submitted to the Secretary's office, with copies to those at the FCC that attended the meetings. Copies of this letter also have been provided to Mania Baghdadi, Linda Seneca, and Qualex International and in Public Notice DA-01 **1264**.

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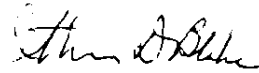
Mr. Marlene H. Dortch

April 23, 2003

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Please direct any questions regarding this notice to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jonathan D. Blake".

Jonathan D. Blake  
*Counsel for NASA*

cc: John Rogovin, Esq.  
Louis Peraertz, Esq.  
Marilyn Sonn, Esq.  
Linda Kinney, Esq.  
Robert Long, Esq.  
Heidi Doerhoff, Esq.